

October 12, 2020

**By ECF**

Hon. Lorna G. Schofield  
United States District Court  
500 Pearl St.  
New York, New York 10007

**Re:    *10012 Holdings, Inc. d/b/a Guy Hepner v. Hartford Fire Ins. Co. et al.,*  
20 Civ. 4471 (S.D.N.Y.) — Joint Status Letter**

Dear Judge Schofield:

The parties to the above case respectfully submit this joint status letter as directed by the Parties' Civil Case Management Plan and Scheduling Order (ECF 13), and in accordance with Rule IV.A.2. of Your Honor's Individual Rules and Procedures for Civil Cases.

**What Discovery Has Taken Place**

Plaintiff 10012 Holdings, Inc. d/b/a Guy Hepner ("Plaintiff") propounded its First Set of Requests for Production and its First Set of Interrogatories on September 8, 2020. On that same date, Defendant Sentinel Insurance Company, Ltd. ("Defendant") propounded its First Set of Requests for Production and First Set of Interrogatories, and its First Requests for Admissions.

Plaintiff provided its responses and objections earlier today, October 12, 2020. Defendant served responses and objections to Plaintiff's First Set of Requests for Production and First Set of Interrogatories on October 8, 2020.

No documents have been produced by either party, but (as indicated below) the parties anticipate meeting the Court-ordered production deadline of October 21.

**Procedural History of the Case to Date**

Plaintiff filed its Complaint on June 6, 2011.

Defendant filed its Motion to Dismiss on September 1, 2020 (ECF 19–21), Plaintiff filed its Opposition to the motion on September 22, 2020 (ECF 23), and Defendant filed its Reply in support of the motion on October 2, 2020 (ECF 24). This motion is currently pending and was fully briefed on October 2, 2020.

**Plan to Meet Court Ordered Discovery Deadlines**

The parties are conferring on the terms of a proposed protective order and anticipate filing a motion for entry of same this week, and producing documents soon thereafter to meet the Court's October 21, 2020 deadline for document production. (ECF ¶ 8.c.)

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Respectfully,

/s/ John V. Golaszewski

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/s/ Charles Michael

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